

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

JAMAINIE Williams # 191682
Plaintiff,

- VS -

Civil Action # 15-523-SMY-MAB

ALEX MDI, et al.,
Defendants.

MOTION FOR APPOINTMENT
OF COUNSEL

NOW COMES plaintiff, JAMAINIE Williams, pro se AND
he humbly moves this COURT PURSUANT TO 28 U.S.C. § 1915(e)(1),
RESPECTFULLY REQUESTING THAT THIS HONORABLE COURT APPOINT HIM
COUNSEL IN THE FURTHERANCE OF THIS CIVIL ACTION.

IN SUPPORT THEREOF plaintiff states:

1). That ON 2 MARCH, 2016 this honorable moved PURSUANT TO
FEDERAL RULES OF CIVIL PROCEDURE 42(a) AND CONSOLIDATED plain-
-tiff's CASE ALONG WITH SEVERAL OTHERS, APPOINTING AS COUNSEL THE
LAW FIRM OF LOEY & LOEY (SARAH GRADY).

2). That ON 21 MAY, 2019 plaintiff RECEIVED VIA U.S. MAIL A LETTER, REPORT AND RECOMMENDATIONS, WITH A MEMORANDUM AND ORDER FROM LDEVY & LDEVY, AND STACI M. YANDIE, SEVERING plaintiff's CLAIMS AND his LEGAL REPRESENTATION.

3). That OVER (20) ONE HUNDRED AND TWENTY DAYS HAVE PAST WITH NO OTHER CORRESPONDENCE FROM THE COURT OR ANOTHER ATTORNEY. 28 U.S.C. § 1915(e)(1) AUTHORIZES THIS COURT TO USE IT'S DISCRETION IN DETERMINING WHETHER OR NOT TO APPOINT COUNSEL TO AN INDIGENT PERSON REQUESTING APPOINTMENT OF COUNSEL.

4). That plaintiff is AN INDIGENT (39) THIRTY NINE YEAR OLD AFRICAN-AMERICAN WITH A 11th GRADE EDUCATION AT BEST. HE IS UNLEARNED IN CIVIL LITIGATION.

5). That BEING INCARCERATED WILL GREATLY HINDER AND AT SOME POINT PROHIBIT plaintiff FROM LITIGATING his CAUSE. AS IT WILL INVOLVE THE HANDLING OF CERTAIN DISCOVERY MATERIALS A INMATE IS NOT ALLOWED TO HAVE, POSSESS OR SEE. THE EXAMINATION AND CROSS EXAMINATION OF WITNESSES AS WELL AS THE COMPLEXITY OF CERTAIN LEGAL ISSUES THAT ARISE THROUGH LITIGATION.

6). That plaintiff is UNDER DOCTOR'S CARE AND TAKING MEDICATION FOR DEPRESSION / Bi-POLAR DISORDER THAT RENDERS him INCAPABLE OF LITIGATING this CASE.

7). That given the Daily Challenges being INCARCERATED PRESENTS NOT TO MENTION THE UNPREDICTABILITY OF PRISON IN GENERAL, given the MENTAL HEALTH OF THE PLAINTIFF ANY ATTEMPTS MADE BY PLAINTIFF TO LITIGATE THIS CAUSE WILL ONLY DELAY AND/OR FRUSTATE THIS COURT.

WHEREFORE, plaintiff prays that this HONORABLE COURT will GRANT his motion for appointment of COUNSEL ISSUING AN ORDER FOR COUNSEL TO BE APPOINTED AND ISSUE A STATUS UP-DATE, OF THE CASE TO DATE, AND ANY OTHER RELIEF THE COURT DEEMS ADEQUATE AND JUST.

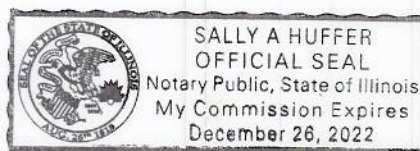
DATED: 10/15/19

Respectfully submitted,
Ja'maine Williams
JAMAINE WILLIAMS #B19682
HILL CORRECTIONAL CENTER
P.O. BOX 1327
GALESBURG, ILL. 61401

STATE OF ILLINOIS
COUNTY OF KNOX

SIGNED AND ATTESTED BEFORE ME ON
THE 15TH OF OCTOBER 2019 BY JAMAINE
WILLIAMS.

Sally A. Huffer
N O T A R Y



IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

JAMAINIE WILLIAMS # B191682
Plaintiff,

-VS-

Civil Action # 15-523-SMY-MAB

ALEX MOLL, et al.,
Defendant.

PROOF OF SERVICE

TO: MEGAN DITZLER # 6318052
ASSISTANT ATTORNEY GENERAL
500 SOUTH SECOND STREET
SPRINGFIELD, ILLINOIS 62701

TO: UNITED STATES DISTRICT JUDGE STACI
M. YANDIE, U.S. DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS DIVISION

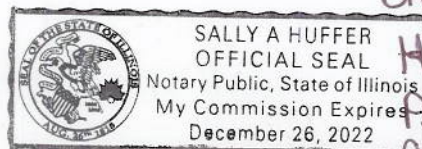
PLEASE TAKE NOTICE THAT ON OR BEFORE 15 OCTOBER, 2019, I
HAVE THE FOLLOWING DOCUMENTS E-FILED FROM THE LAW LIBRARY HERE AT THE
HILL CORRECTIONAL CENTER: (1) MOTION FOR APPOINTMENT OF COUNSEL

PURSUANT TO 28 USC § 1746, 18 U.S.C. 1621, OR 735 ILCS 5/109, I DECLARE UNDER
PENALTY OF PERJURY THAT I AM THE NAMED PARTY IN THE ABOVE ACTION, THAT I
HAVE READ THE ABOVE DOCUMENT(S) AND THE INFORMATION CONTAINED THEREIN IS
TRUE AND CORRECT. EXECUTED ON 15 OCTOBER, 2019

STATE OF ILLINOIS
COUNTY OF KNOX

SIGNED AND ATTESTED BEFORE ME
ON THE 15TH OF OCTOBER 2019
BY JAMAINIE WILLIAMS.

Sally A. Huffer
NOTARY



Respectfully Submitted,
Jamaine Williams
JAMAINIE WILLIAMS # B191682
Hill CORRECTIONAL CENTER
PO. BOX 1700
SALESBURG, ILL. 61402